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EX PARTE VIA ELECTRONIC FILING

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: In the Matter of Transforming the 2.5 GHz Band, WT Docket No. 18-120
Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122
Use of Spectrum Bands Above 24 GHz for Mobile Radio Services, GN Docket No. 14-177

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1206(b), this letter summarizes oral presentations regarding the above-referenced proceedings made during (i) a meeting held at the Federal Communications Commission ("FCC" or "Commission") on June 27, 2019, attended by Joan Marsh and Hank Hultquist representing AT&T Services, Inc. ("AT&T") and by Aaron Goldberger, acting Wireless and International Advisor to Chairman Ajit Pai and (ii) a second meeting at the FCC on June 28, 2019, attended by Joan Marsh and Brian Benison representing AT&T and by Umair Javed, Wireless and International Legal Advisor to Commissioner Jessica Rosenworcel.

During the meetings, AT&T encouraged the Commission to take critical steps to improve the viability of its proposed overlay auction of spectrum in the 2.5 GHz EBS band.¹ In particular, the Commission should strive to remedy the comparative information advantage of existing EBS licensees and lessees by making critical details, including lease terms and existing and planned deployments, available to all auction participants. Moreover, to ensure adequate buildout of this critical spectrum, the Commission should also apply the new buildout obligations to, at a minimum, all 2.5 GHz EBS spectrum licensees that have leased their spectrum for commercial services. In addition, AT&T applauded the Commission for the celerity of its handling of the proceeding involving the auction of millimeter-wave spectrum in the 37/39/47 GHz bands – scheduled to begin on December 10, 2019 -- which is vitally important to the prompt deployment of 5G services. Finally, AT&T urged the Commission to expeditiously resolve the C-Band proceeding and make that critical mid-band spectrum available for rapid broadband deployment.

¹ Letter dated June 28, 2019 from Alex Starr, AT&T, to Marlene Dortch, FCC, WT Docket No. 18-120.

Pursuant to the Commission's rules, a copy of this letter is being filed electronically in the above-referenced docket. Please do not hesitate to call me if you have questions.

Respectfully submitted,

/s/ Brian J. Benison

Cc: Aaron Goldberger
Umair Javed